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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

**Case No. 3:23-cv-04597-EMC**

**Filed:** September 7 2023

**District Judge:** Honorable Edward M. Chen

**ASHLEY GJOVIK, an individual,**

Plaintiff,

v.

**APPLE INC, a corporation,**

Defendant.

**MOTION FOR JUDICIAL NOTICE**

**Filed: December 25 2023**

**ADDITIONAL EXHIBITS**

**Hearing**

Dept: Courtroom 5, 17th Floor (Virtual)

Date: February 8, 2024 1:30 p.m.

**Motion for Judicial Notice Cover Page: Exhibit 10**

News Articles & Press Releases about Apple

***Declaration:*** *I verified the authenticity of each of these documents. A true and correction version of each document is attached in each exhibit. I declare under penalty of perjury this is true and correction. /s/ Ashley M. Gjovik (January 2 2024).*

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**MOTION FOR JUDICIAL NOTICE (PART II)**  
**ADDITIONAL EXHIBIT**

**SECTION:**

NJ EPA: Lisa Jackson as Commissioner



## OFFICE OF THE COMMISSIONER

[Download Bio \(PDF\).](#)

### About Commissioner Lisa P. Jackson

*New Jersey Department of Environmental Protection*

As Commissioner of the New Jersey Department of Environmental Protection (DEP), Lisa P. Jackson leads a staff of 3,400 professionals dedicated to protecting, sustaining and enhancing New Jersey's water, air and land, and preserving its wealth of natural and historic resources.

Before her nomination by Governor Corzine, Jackson served as the DEP's Assistant Commissioner for Land Use Management. Under her leadership, the DEP crafted regulatory standards for implementing the landmark Highlands Water Protection and Planning Act.

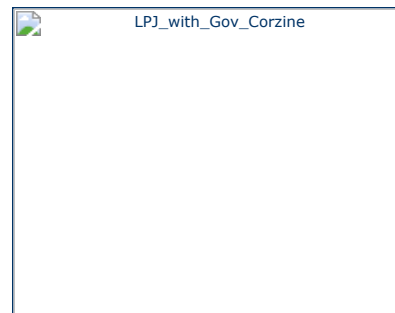
Upon joining DEP, Jackson served as Assistant Commissioner for the Division of Compliance and Enforcement. As the department's chief environmental enforcer, Jackson led pioneering compliance sweeps in Camden, NJ and Paterson, NJ where families live in close proximity to regulated facilities. Working with the county officials, State Police and EPA, DEP mobilized more than 200 inspectors to conduct more than 2,100 compliance investigations and issued more than 500 violations in the two cities.

Prior to joining DEP, Jackson served for 16 years with the U.S. Environmental Protection Agency (EPA), initially at its headquarters in Washington and more recently at its regional office in New York City. During her tenure at the EPA, Jackson worked in the federal Superfund site remediation program developing key hazardous waste cleanup regulations, overseeing hazardous waste cleanup projects throughout central New Jersey and directing multimillion-dollar cleanup operations. She later served as deputy director and acting director of the region's enforcement division.

Jackson currently serves on several boards and committees, including the NJ Outdoor Women's League, Inc., New Jersey Sustainable State Institute, New Jersey Development Council, NJ Intergovernmental Protection Commission, the Executive Committee of the Natural Resources Leadership Council of the States, the Board of Trustees for Prosperity NJ, FIX DMV and the Governor's Intergovernmental Relations Commission, in addition to serving as Chair of the Ozone Transport Commission and Vice Chair of the Environmental Council of the State's Compliance Committee. The New Jersey Conference of Mayors named Jackson the 2007 Cabinet Member of the Year.

A native of New Orleans, Jackson earned a master's degree in chemical engineering from Princeton University. She is a summa cum laude graduate of Tulane University's School of Chemical Engineering.

Jackson resides in East Windsor. She is married to Kenny Jackson and is the proud mother of two wonderful sons, Marcus and Brian.



Commissioner Lisa P. Jackson and Governor Jon S. Corzine at the bill-signing ceremony for the *Green Acres, Farmland, Blue Acres and Historic Preservation Bond Act of 2007*, which put Public Question #3 on the November 2007 ballot.

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Last Modified: September 4, 2007

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**MOTION FOR JUDICIAL NOTICE (PART II)**  
**ADDITIONAL EXHIBIT**

**SECTION:**

US EPA: Lisa Jackson as Administrator



## Biography of Lisa P. Jackson

While Administrator, Lisa P. Jackson was named one of *Newsweek's* "Most Important People in 2010," featured on *Time* magazine's 2010 and 2011 lists of the "100 Most Influential People in the World", listed in *Essence* magazine's "40 Women Who Have Influenced the World," and profiled in *O* magazine for her work to protect our nation's air, water and land from pollution that threatens human health.

Raised a proud resident of New Orleans, Louisiana, Administrator Jackson is a *summa cum laude* graduate of Tulane University and earned a master's degree in chemical engineering from Princeton University. In 2012, she received an honorary doctorate degree from Tulane University. She has also received an honorary law degree from Pace Law School.

She started with the EPA as a staff-level scientist in 1987 and spent the majority of her career working in EPA's Region 2 office in New York. In 2002, Jackson joined the New Jersey Department of Environmental Protection and was appointed Commissioner of the agency in 2006.

During her tenure, Administrator Jackson focused on seven priorities for EPA's future: taking action on climate change; improving air quality; cleaning up our communities; protecting America's waters; assuring the safety of chemicals; expanding the conversation on environmentalism and working for environmental justice; and building stronger state and tribal partnerships.

Administrator Jackson outlined principles to modernize our nation's 30-year old chemical management laws, called for unprecedented innovation in drinking water protection efforts, and announced tough standards to clean the air we breathe.

In response to the greatest economic downturn since World War II, EPA invested in job-creating environmental protection projects across the country. Those investments led to cleaner communities that are more competitive in the race to attract jobs, while also encouraging the development and use of innovative environmental technologies.

In December of 2009, Administrator Jackson announced an endangerment finding on greenhouse gases, setting the stage for EPA action on climate change. Under her leadership, EPA issued clean air standards designed to reduce emissions from large facilities without burdening small businesses, and a clean cars program – crafted in collaboration with the Department of Transportation and the auto industry – that will make American vehicles more fuel-efficient than ever before.

As the first African-American to serve as EPA Administrator, Jackson made it a priority to expand outreach to communities that are historically under-represented in environmental action. EPA stepped up protection for vulnerable groups including children, the elderly, and low-income communities that are particularly susceptible to environmental and health threats.

Last updated on September 12, 2016

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**MOTION FOR JUDICIAL NOTICE (PART II)**  
**ADDITIONAL EXHIBIT**

**SECTION:**

Apple: Lisa Jackson Announce

LISA JACKSON

VICE PRESIDENT  
ENVIRONMENT, POLICY AND SOCIAL  
INITIATIVES



Lisa Jackson is Apple’s vice president of Environment, Policy and Social Initiatives, reporting to CEO Tim Cook.

Lisa oversees Apple’s efforts to minimize its impact on the environment by addressing climate change through renewable energy and energy efficiency, using greener materials and inventing new ways to conserve precious resources. She is also responsible for Apple’s education policy programs, its product accessibility work and its worldwide government affairs function.

From 2009 to 2013, Lisa served as Administrator of the US Environmental Protection Agency. Appointed by President Barack Obama, she focused on reducing greenhouse gases, protecting air and water quality, preventing exposure to toxic contamination, and expanding outreach to communities on environmental issues.

She has also served as chief of staff to New Jersey Governor Jon S. Corzine and as commissioner of New Jersey’s Department of Environmental Protection.

Lisa holds a master’s degree in Chemical Engineering from Princeton University and a bachelor’s degree in Chemical Engineering from Tulane University. She serves on the boards of Tulane, SF Film, Conservation International and Emily’s List.

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**MOTION FOR JUDICIAL NOTICE (PART II)**  
**ADDITIONAL EXHIBIT**

**SECTION:**



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# Apple's Art Fong to Lead ChemFORWARD Technical Advisory Group

## Apple's Art Fong to Lead ChemFORWARD Technical Advisory Group

Dr. Art Fong, green chemistry lead at Apple's Environmental Technologies group, will join Dr. Lauren Heine, ChemFORWARD's director of safer materials & data integrity, to co-chair ChemFORWARD'S newly launched Technical Advisory Group. In this role, Fong will guide harmonization, data quality, process transparency, and scientific integrity.

At Apple, Fong has driven efforts to remove harmful substances from the company's supply chain and develop safer substitutes. He is an active member of the scientific and technical communities collaborating to advance green chemistry and safer alternatives.



"I am honored to welcome Art in this leadership role for our technical advisory group," said Stacy Glass, executive director of ChemFORWARD. "Art is a globally respected practitioner and champion of green chemistry and circular design across industry sectors. His active participation in this group will be incredibly potent in our ambitious goal to establish a globally harmonized repository of chemical hazard assessments and safer alternatives."

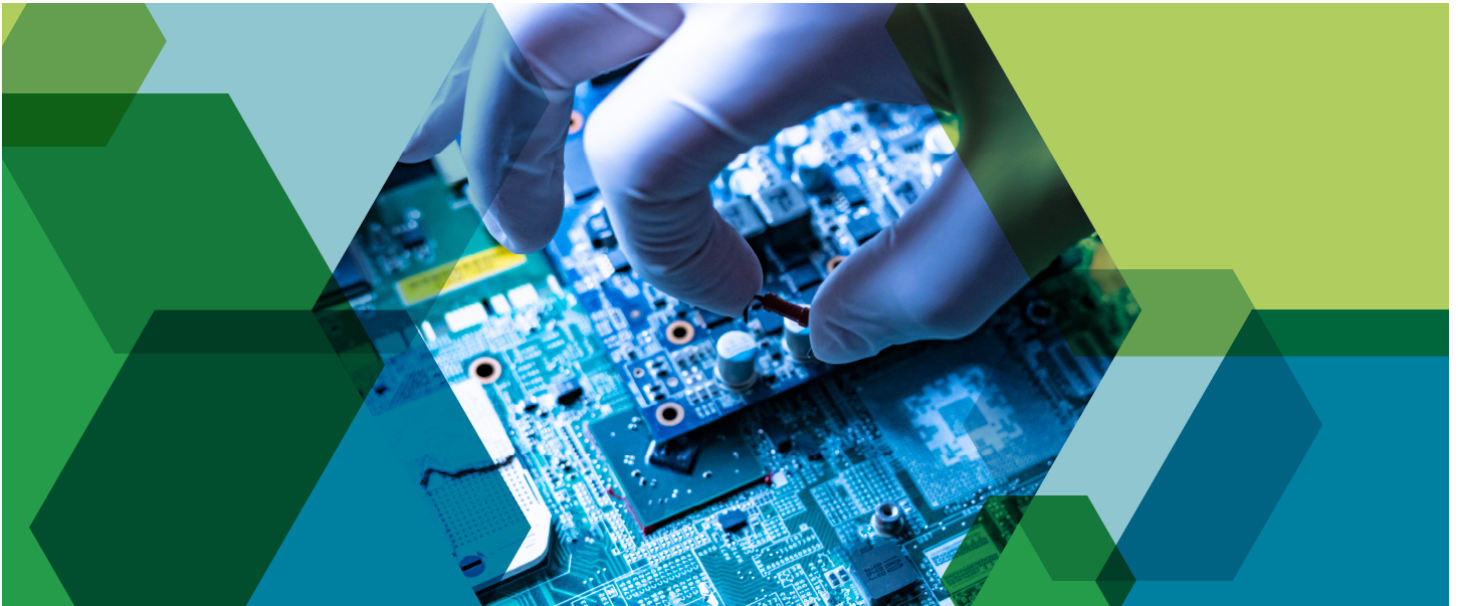
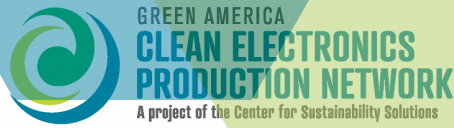
His work in advancing sustainability and safer chemistry at one of the world's most innovative technology companies, along with his leadership on California's Green Ribbon Science Panel and Green America's Clean Electronics Production Network will offer unique and unrivaled insights into ChemFORWARD's strategic product development with a focus on technical content and features that promote adoption for better decision making by product designers and manufacturers interested in making safe and circular products.



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Updates    Toward Zero Exposure

# ELECTRONICS INDUSTRY LEADERS ADVANCE TOWARD ZERO EXPOSURE TO WORKERS THROUGHOUT THE SUPPLY CHAIN

 August 03, 2021

The Clean Electronics Production Network is pleased to announce the **Toward Zero Exposure program**, which has been developed with noted sustainability and social responsibility leaders. As Founding Signatories, Apple, Dell Technologies and HP Inc., commit to accelerating existing efforts in chemical safety and boosting awareness of the need to improve chemical management practices across the global electronics manufacturing industry to eliminate workers' exposure to hazardous chemicals.

As members of a multi-stakeholder collaborative network including labor, health and safety advocates, these companies are leading by example. These Founding Signatories invite companies throughout the electronics supply chain to join their commitment to:

- **Prioritize the elimination or substitution of priority chemicals** with safer alternatives and continue to protect workers until that is achieved
- **Collect data on the process chemicals used** in manufacturing electronic products
- **Advance worker engagement and participation** as an essential element of a best-in-class safety culture for managing process chemicals
- **Reach Deeper into** the overlapping and complex electronics supply chain to reduce worker exposure to hazardous chemicals
- **Verify and Report** to ensure progress toward implementing the commitments to strengthen accountability to workers, the public and other stakeholders

“These signatories’ commitment represents groundbreaking progress in the protection of workers from hazardous chemicals in the electronics supply chain,” said Alisa Gravitz, CEO of CEPN parent organization Green America. “The Toward Zero Exposure program’s unique development through CEPN’s multistakeholder consensus process creates an exceptional platform to leverage the enormous effort individual organizations have already put into protecting workers.”

CEPN, a multi-stakeholder innovation network, unites diverse stakeholders including electronics industry brands and suppliers, labor and environmental advocates, governments and other leading experts to collaboratively understand, address and eliminate workers exposure to hazardous chemicals in electronics production. CEPN is a program of Green America’s Center for Sustainability Solutions.

For more information, refer to our [Frequently Asked Questions document](#) or contact [cepn@greenamerica.org](mailto:cepn@greenamerica.org). Media inquiries should be directed to [media@towardzeroexposure.org](mailto:media@towardzeroexposure.org).

Subscribe to CEPN’s newsletter and find out more about the program’s activities, origins and participants at [www.towardzeroexposure.org](http://www.towardzeroexposure.org).

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If you are interested in learning more about CEPN, or if you would like to be involved please contact us at [info@cleanelectronicsproduction.org](mailto:info@cleanelectronicsproduction.org).



**Clean Electronics Production Network**

1612 K Street NW, Suite 1000

Washington, DC 20006

**Main Email:** [info@cleanelectronicsproduction.org](mailto:info@cleanelectronicsproduction.org)

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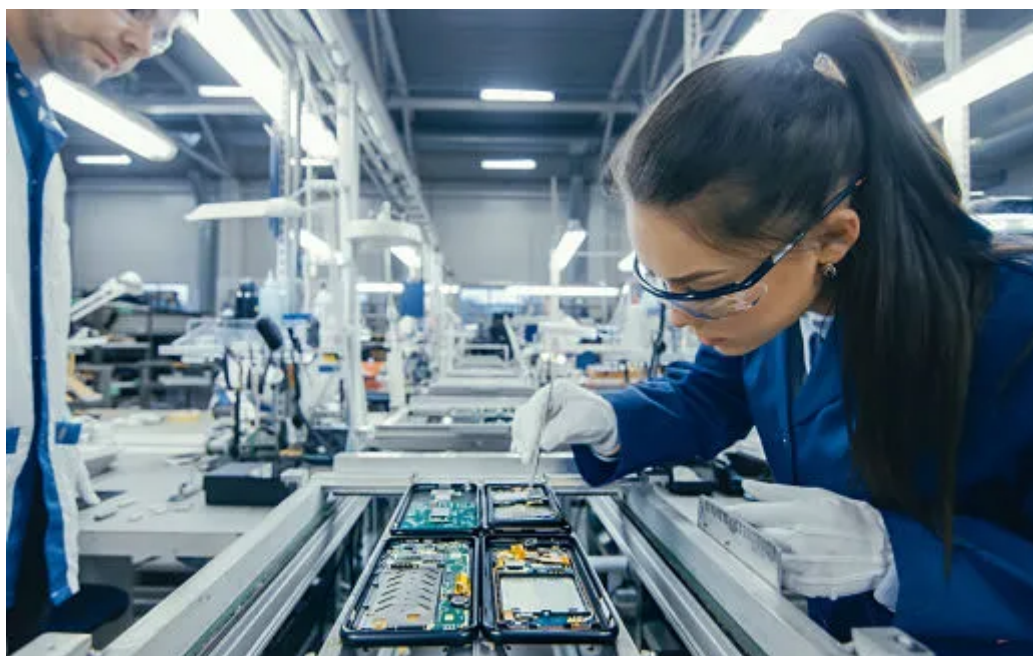
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# Apple, Dell, HP commit to protect workers from hazardous chemicals

05 August 2021

Pledge includes prioritising the elimination or substitution of priority substances, such as solvents



Electronics giants Apple, Dell and HP Inc have committed to the Towards Zero Exposure programme – an initiative aimed at reducing worker exposure to hazardous chemicals along the electronics supply chain.

The Clean Electronics Production Network (CEPN) – which formed in 2016 and comprises the US EPA, major electronics companies, academia, NGOs and other stakeholders – launched the programme on 3 August with the three companies, which are CEPN members, announced as the founding signatories.

The CEPN, which is an organisation set up under US non-profit Green America, said signatories commit to:

- prioritise the elimination or substitution of priority chemicals with safer alternatives and continue to protect workers until that is achieved;
- collect data on the process chemicals used in manufacturing electronic products;

- advance worker engagement and participation as an essential element of a best-in-class safety culture for managing process chemicals;
- reach deeper into the overlapping and complex electronics supply chain to reduce worker exposure to hazardous chemicals; and
- verify and report on activities to ensure progress towards implementing the goals.

It said they also agree to protecting workers within suppliers' facilities as well as their own, which includes urging their suppliers to join the programme.

The commitments focus on companies' use of process chemicals, strengthening the culture of worker safety and engagement, reducing worker exposure to hazardous chemicals while substituting safer alternatives within their own manufacturing processes and promoting change throughout their supply chain.

On why only three member companies have signed up to the programme, the CEPN said it "recognised that the choice to become a signatory, publicly promising to make progress in the programme's broad and robust commitments, takes place within a corporate decision-making process with competing priorities".

It said it "looks forward to adding more companies from among CEPN members and the broader industry as we proceed on the journey towards zero exposure of workers in the electronics industry to hazardous process chemicals".

The organisation and the three signatories are encouraging companies to join them and sign up to the commitments. The programme is open to all companies (brands and suppliers) in the electronics supply chain.

## Priority chemicals

The CEPN has identified a first round of process chemicals that the companies should prioritise for elimination or substitution in electronics manufacturing.

This targets solvents used in manufacturing cleaning products, which are used in high volumes throughout electronics production and can have a "significant impact on worker health and safety because they are often used for hands-on work". The substances are:

- 1-bromopropane;
- benzene;
- dichloromethane;
- methanol
- N-hexane;



- N-methyl-pyrrolidone – with an exemption for photoresist stripping applications, for which the CEPN says there is no viable alternative;
- tetrachloroethylene;
- toluene; and
- trichloroethylene.

The CEPN said further rounds of priority chemicals will be added to the programme approximately every one to two years.

The programme sets a culture where all workers are “knowledgeable about potential hazards and actively participate and speak up for their safety and that of their co-workers”, it said.

This will include training, a joint worker-management safety committee and surveys to advance this two-way communication.

“The programme was designed such that workers are consulted, informed and actively participating in protecting their health,” the CEPN said.

#### **List of Chemicals:**

- 1-bromopropane;
- benzene;
- dichloromethane;
- methanol
- N-hexane;
- N-methyl-pyrrolidone – with an exemption for photoresist stripping applications, for which the CEPN says there is no viable alternative;
- tetrachloroethylene;
- toluene; and
- trichloroethylene.

#### **List of CEPN Members:**

- Apple (programme signatory)
- CEREAL
- Cisco Systems
- Clean Production Action (CPA)
- Dell (programme signatory)
- Fairphone
- Flex

- Green Electronics Council (GEC)
- HP (programme signatory)
- International Campaign for Responsible Technology (ICRT)
- Intel Corporation
- Inventec Performance Chemicals
- Responsible Business Alliance (RBA)
- Scivera
- Seagate Technology
- Social Accountability International (SAI)
- Sustainable Purchasing Leadership Council (SPLC)
- TCO Development
- The Sustainability Consortium (TSC)
- UC, Berkeley
- UC, Irvine
- U-Mass, Lowell
- US EPA

*For the full article, visit <https://chemicalwatch.com/310444/apple-dell-hp-commit-to-protect-workers-from-hazardous-chemicals>*